

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of the Commission's Amateur	)	
Radio Service Rules to Permit Greater	)	RM-11708
Flexibility in Digital Data Communications	)	
	)	

To: The Chief, Wireless Telecommunication Bureau  
Via: Office of the Secretary

COMMENTS ON PETITION FOR RULEMAKING

1. In Petition for Rule Making RM-11708 the ARRL requests on the behalf of Amateur Radio operators a change in the rules on digital transmission on the HF bands. This change would remove the outdated wording which unnecessarily precludes amateurs from innovating new data transmission methods within the existing framework.
2. This change would facilitate further innovation and experimentation by Amateur Radio operators by allowing greater flexibility in the data transmission. Technologies have already been proven that can accomplish higher throughput without adversely affecting bandwidth on the HF bands, but that require a higher symbol rate than is currently permitted (i.e. PACTOR 4). This would be in keeping with CFR 47.97.1(b) *Continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art* and with CFR 47.97.1(c) *Encouragement and improvement of the amateur service through rules which provide for advancing skills in both the communication and technical phases of the art*.
3. On behalf of myself, and my family members who hold Amateur Radio licenses, we support the ARRL in their request. Erik Larson (AD7OV, Amateur Extra), Heather Larson (AD7OW, Amateur Extra), Christopher Larson (KF7JRE, Amateur Technician), and Johnathan Larson (KF7JRK, Amateur Technician)

Respectfully Submitted,

Erik Larson  
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FRN 0003848892  
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